TOYOTA

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VIA ELECTRONIC DELIVERY

July 23, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Room TWA325
Washington, DC 20554
Re: *Ex Parte*

ET Docket No. 13-49, *Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*

Dear Ms. Dortch:

This is to inform you that on Thursday, July 19, 2018, John Kenney of Toyota ("Toyota Representative") met with Julius Knapp, Martin Doczkat, Patrick Forster, Howard Griboff, Matthew Hussey, Walter Johnston, and Aspasia Paroutsas of the Office of Engineering and Technology. The Toyota Representative discussed Toyota's announcement in April of 2018 to deploy Dedicated Short-Range Communications (DSRC) systems on Toyota and Lexus vehicles sold in the United States starting in 2021, with a goal of adoption across most of its lineup by the mid-2020's. The Toyota Representative noted that the DSRC announcement by Toyota, the recent announcement by General Motors to further expand its DSRC deployment in the United States, and significant investments in DSRC-enabled infrastructure in a majority of states proves that DSRC deployment in the United States continues to move forward.

The Toyota Representative reiterated the importance of ensuring that DSRC operation remain free from interference and expressed continued support for additional phases of testing to help determine whether unlicensed devices can operate in the band without causing harmful interference to DSRC. The Toyota Representative noted that there are important interference scenarios that have not yet been tested during the first phase of testing.

The Toyota Representative shared the industry's consensus DSRC channel usage plan. The Toyota Representative noted that the channel usage plan includes safety-related communication on each channel. The Toyota Representative also provided information about the Control Channel and explained its important role in providing information about DSRC services available in an area.

The Toyota Representative reiterated Toyota's strong support for the Commission's decision in 2003 to prioritize interoperability through the requirement to conform to a single communication standard. The Toyota Representative reiterated the importance of interoperability in fully realizing the safety benefits of vehicle-to-vehicle and vehicle-to-infrastructure communication.

The Toyota Representative provided an update on the new Next Generation V2X efforts of the IEEE 802.11 Working Group. The Toyota Representative explained that this technology will be able to share the same channel with DSRC, offering the potential for seamless evolution in future years from DSRC to Next Generation V2X. The Toyota Representative contrasted this with the challenges of evolving from DSRC to an incompatible technology, such as LTE V2X, that cannot share the same channel.

The Toyota Representative disputed claims that LTE V2X is currently a viable alternative to DSRC. The Toyota Representative raised questions about the reliability of test results recently shared with the Commission by LTE V2X proponents. The Toyota Representative further explained that the two sharing proposals currently being tested by the Commission would only enable sharing between DSRC and unlicensed devices and noted that sharing the band with unlicensed devices would be made more challenging if a non-DSRC technology were permitted to use the band.

Attached are several documents shared by the Toyota Representative during the meeting, including information on the extent of operational and planned deployment of DSRC V2I Roadside Units in the United States, the SAE Standard J2945 DSRC Channel Usage Plan, and an analysis of the 5GAA test results comparing the performance of DSRC and LTE V2X technologies.

/s/Hilary M. Cain
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